

REMARKS

Claims 1-19, 21-28, and 32-34 are now pending in the application. Claims 1, 2, 3, 15, 16, 28, 32, and 33 are now amended. The claim amendments are fully supported by the application as filed and do not present new matter. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

MINOR INFORMALITIES

The Office Action alleges that the terms “angled cradle” and “at an angle” as used in the claims are ambiguous because points of reference are allegedly not provided. In order to clear up any perceived ambiguities, Applicant now amends the claims to either delete these terms or further define these terms. Therefore, Applicant respectfully requests reconsideration and withdrawal of this objection.

The Office Action states that Claim 28 should be amended to provide proper antecedent basis. Applicant now amends Claim 28 to depend from Claim 22. The features of Claim 28 now have proper antecedent basis. Therefore, Applicant respectfully requests reconsideration and withdrawal of this objection.

PERSONAL INTERVIEW

Applicant would like to thank the Examiner for the courtesies extended during the personal interview of May 17, 2005 with its representative, W.R. Duke Taylor. During the interview, differences between Applicant's invention and the prior art were generally discussed. No agreements were reached.

REJECTIONS UNDER 35 U.S.C. §§ 102 AND 103

Claims 1, 3-6, 15, 17, and 19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Russell (U.S. Pat. No. 4,333,300).

Claims 8, 10, 11, 15, 18, 20, and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Russell reference in view of the Admitted Prior Art.

Claims 2 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Russell reference and in further view of Harkness (U.S. Pat. No. 3,830,036).

Claims 7-9, 13, 14, 22-28 and 32-34 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Russell and Paxton et al. (U.S. Pat. No. 3,126,685).

These rejections are respectfully traversed.

Independent Claims 1 and 15 stand rejected under Section 102 in light of the Russell reference. Independent Claim 15 is further rejected under Section 103 in view of the Russell reference in combination with the Admitted Prior Art.

Independent Claim 1 is now amended to recite, in part, “an inbound portion having: a first cradle positioned at an acute angle relative to a horizontal plane of said inbound portion; and a second cradle positioned at an acute angle relative to a horizontal plane of said inbound portion.” “Said first cradle is integral with said second cradle.” “Said first cradle and said second cradle are orientated to support the container such that the container is rotated toward an operating position of the work cell.”

Amended Claim 15 recites, in part, “said outbound portion including an outbound cradle positioned at an acute angle relative to a horizontal plane of said outbound portion.”

The Russell reference appears to disclose, with reference to Figure 2, a Belt 28A and Belts 300, 302, 304, and 308. The Office Action asserts that the Belt 28A is a first angled cradle and Belts 300, 302, 304 or 308 are second angled cradles. Applicant respectfully disagrees with the Examiner's characterization of these features of the Russell reference. The Belts 28A, 300, 302, 304, and 308 are not cradles, but rather transfer belts for transferring the envelopes 24A to the knife 312 where the envelopes are cut using the knife 312.

The Russell reference fails to disclose or suggest an inbound portion having "a first cradle positioned at an acute angle relative to a horizontal plane of said inbound portion and a second cradle positioned at an acute angle relative to a horizontal plane of said inbound portion." The Russell reference also fails to disclose or suggest that the "first cradle is integral with said second cradle" and "wherein said first cradle and said second cradle are orientated to support the container such that the container is rotated toward an operating position of the work cell." All of these features are set forth in amended Claim 1.

The Russell reference fails to disclose or suggest each and every feature of amended Claim 1. Therefore, the Russell reference fails to anticipate Claim 1 and those claims dependent therefrom. Applicant respectfully requests reconsideration and withdrawal of this Section 102 rejection of Claim 1 and those claims dependent therefrom.

The Russell reference further appears to disclose suction cup arms 154A and 178A, as illustrated in Figure 4. The suction cup arms support the envelope 24A in an open position. The Office Action appears to allege that the suction cup arms are a

cradle. Applicant respectfully disagrees with the Office Action's interpretation of this portion of the Russell reference. The suction cup arms are not a cradle as set forth in amended Claim 15. Specifically, the Russell reference fails to disclose or suggest an "outbound portion including an outbound cradle positioned at an acute angle relative to a horizontal plane of said outbound portion, said outbound cradle movable between a forward position and a rear position," as set forth in amended Claim 15.

The Russell reference fails to disclose or suggest each and every feature of amended Claim 15. Therefore, the Russell reference fails to anticipate or render obvious amended Claim 15 and those claims dependent therefrom. Applicant respectfully requests reconsideration and withdrawal of these Section 102 and Section 103 rejections of Claim 15 in light of the Russell reference.

Independent Claim 32 stands rejected in light of the Russell reference and the Paxton et al. reference. Amended Claim 32 recites, in part, an inbound portion having "a first inbound cradle including a first inbound surface and a second inbound surface abutting said first inbound surface and orientated at approximately a 90° angle to said first inbound surface; and a second inbound cradle including a third inbound surface and a fourth inbound surface abutting said third inbound surface and orientated at approximately a 90° angle to said third inbound surface." Amended Claim 32 also discloses "an outbound portion having an outbound cradle including a first outbound surface and a second outbound surface abutting said first outbound surface and orientated at approximately a 90° angle to said first outbound surface."

As set forth above, the Russell reference appears to disclose belts 28A, 300, 302, 304, and 308. The Russell reference also appears to disclose suction cup arms 154A and 178A.

The Russell reference fails to disclose or suggest “a first inbound cradle including a first inbound surface and a second inbound surface abutting said first inbound surface and orientated at approximately a 90° angle to said first inbound surface,” as set forth in amended Claim 32. The Russell reference also fails to disclose or suggest “a second inbound cradle including a third inbound surface and a fourth inbound surface abutting said third inbound surface and orientated at approximately a 90° angle to said third inbound surface,” as set forth in amended Claim 32. Further, the Russell reference fails to disclose or suggest “an outbound portion having an outbound cradle including a first outbound surface and a second outbound surface abutting said first outbound surface and orientated at approximately a 90° angle to said first outbound surface.” Therefore, the Russell reference fails to disclose or alone suggest each and every feature of amended Claim 32.

The Paxton et al. reference appears to disclose a machine for simultaneously closing the top and bottom of a cardboard carton. The Paxton et al. reference fails to disclose or suggest an inbound portion having a first inbound cradle and a second inbound cradle, and an outbound portion having an outbound cradle, as set forth in amended Claim 32. Therefore, the Paxton et al. reference fails to disclose or alone suggest each and every feature of amended Claim 32.

Because neither the Russell reference nor the Paxton et al. reference alone disclose or suggest each and every feature of amended Claim 32, combination of these

references fails to render obvious each and every feature of amended Claim 32. Applicant respectfully requests reconsideration and withdrawal of this Section 103 rejection of Claim 32.

AMENDMENTS TO CLAIMS 2, 3, 16 AND 33

Claims 2, 3, 16 and 33 are now amended. The amendments to these dependent claims are simply to either correspond to amendments made to their respective independent claims or to clarify the subject matter being claimed. The amendments to these claims do not add new subject matter and are fully supported by the application as filed. Applicant respectfully requests consideration and allowance of these claims at least for the reasons set forth above with respect to the independent claims from which these claims are dependent on.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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